

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GOVERNMENT'S SENTENCING MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Shaun E. Sweeney, Assistant United States Attorney for said district, submitting as follows:

1. The defendant is to be sentenced in this case at a hearing scheduled for January 13, 2022 at 10:30 am. According to the Presentence Investigation Report, the defendant's applicable Guidelines range for the instant case is 4-10 months imprisonment.

2. Upon consideration of the sentencing factors set forth in 18 U.S.C. Section 3553(a), the Court should impose a sentence within the applicable Guidelines range. There is nothing remarkable as to the history or characteristics of the defendant that would warrant a variance from the applicable range. The other sentencing factors, including the nature and circumstances of the offense, the need for the sentence to deter similar criminal conduct, and the need to provide just punishment for the offense, also warrant a sentence within the applicable Guidelines range with no variance.

3. The government is not seeking forfeiture or restitution in this case.

Respectfully submitted,

CINDY K. CHUNG
United States Attorney

/s/ *Shaun E. Sweeney*
SHAUN E. SWEENEY
Assistant United States Attorney
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